

DEPARTMENT OF WATER RESOURCES**CALIFORNIA WATER COMMISSION**

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December 2, 2013

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California Water Plan Update 2013
California Department of Water Resources
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Dear Mr. Massera:

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Member

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Member

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Member

Last month, the California Water Commission provided general comments on Volume 1 of the public review draft of the California Water Plan (CWP) Update 2013, and conveyed its support for the highlighted themes of Integrated Water Management, improved alignment between government agencies, and investing in innovation and infrastructure.

Anthony Saracino
Member

Sue Sims
Executive Officer

Since then, the Commission has reviewed Volume 3, Resources Management Strategies which provides valuable data and historical perspective, together with focus and vision on a broad range of policies and programs for managing water sustainably in California today and in the future. In particular, we believe this CWP Update 2013 will support decisions and related actions for key state programs including two of the most significant efforts currently underway, the Bay Delta Conservation Plan and the Central Valley Flood Protection Plan. We commend the Department of Water Resources staff, the subject matter experts from other state agencies on the Water Plan Steering Committee, and the hundreds of other experts and stakeholders who contributed to this extensive process.

While all of the Strategic Plan's Objectives and Resource Management Strategies touch upon issues of great interest to the Commission, we want to take this opportunity to provide comments on several cross-cutting themes that are fundamental to the future of successful water management, support economic growth, and can help protect vital environmental and cultural resources in California.

- **Interdependence and Integration of Water Projects:** The Plan's Objectives and Strategies sections reaffirm the importance of integrated resource planning. The Commission believes this is particularly important in the areas of water storage and conveyance where new challenges require that projects not only support traditional goals of water supply reliability and flood protection, but also ecosystem restoration, water quality improvements and adaptation to climate change. The chapters on Groundwater and Conjunctive Management, Water Transfers, System Reoperation highlight the interdependence of these resource management strategies with improved storage and conveyance. Having done considerable work on water storage

projects including their costs and public benefits, the Commission would like to underscore the importance of evaluating individual projects in the context of the systemwide benefits they provide for sustainable water management.

- **Funding:** Many of the chapters recommend funding for a specific type of project or Resource Management Strategy. While a case can certainly be made for funding any or all of these strategies, the Commission believes the state must strategically invest in the most critical projects that provide maximum benefits given the growing demands on public and private funding for water management. Funding must be evaluated within the context of a broader statewide funding plan or strategy. For this reason, the Commission supports the related Objective 17, *Improve Integrated Water Management Finance Strategy and Investments*.
- **Climate Change:** The Commission appreciates that the Plan addresses climate change in every Resource Management Strategy and provides new data and information that can inform decisions for water managers, planners, and policy makers at all levels. Given the value of this information, the Commission would also recommend that a separate chapter or appendix document be prepared to summarize the role of each resource management strategy in addressing climate change.
- **Agency Alignment and Collaboration:** The theme of improved agency alignment is highlighted in Objective 16, *Strengthen Alignment of Government Processes and Tools* and reinforced in various Resource Management Strategies. The Commission agrees that collaboration at all levels and through all phases of project development and operations is critical to the effective management of California's water, and provides confidence to the public that agencies can work together efficiently toward a common goal. This theme aligns closely with the Commission's Strategic Plan Goal 3C to improve coordination between federal, state, tribal and local public agencies and stakeholders. We also note that the Water Plan Update process itself represents one of the best models of statewide coordination and collaboration to promote sound water management planning to address future scenarios.
- **Demand Management:** The Commission supports Objective 2, *Use and Reuse Water More Efficiently*, as well as the Resource Management Strategies on Agricultural and Urban Water Use Efficiency. However, water use efficiency and reuse may not be enough to reduce future water demand to sustainable levels. We recommend that the Plan support the implementation of additional demand management measures at the Regional level through Integrated Water Management Programs in order to promote sustainable future water use.

- **Environmental Justice and Disadvantaged Communities:** All Californians deserve access to safe drinking water, equal access to state funds for water projects, and full inclusion in planning processes which affect their communities. However, there are still communities in California where these basic needs are not met. The Commission strongly supports Objective 13, *Ensure Equitable Distribution of Benefits* and its related actions as a path towards environmental justice, and asks that the CWP Update 2013 recommend stronger measures to enable Disadvantaged Communities to fully participate in Integrated Regional Water Planning as a means of addressing these inequities.
- **Improved Data and Technical Assistance:** In Objective 10, *Improve Data, Analysis, and Decision Support Tools* and in many Resource Management Strategies, the need for improved data collection, data sharing and consistency, and technical assistance for local agencies emerges as a common theme. Additionally, improving the compatibility of databases will ensure that agencies are able to effectively utilize available data. The Commission strongly supports efforts by the state to improve the integrity, consistency, compatibility, and accessibility of data that enables better water management.
- **Outreach and Education:** The state's role in providing outreach and education to water agencies, water managers, and water users, and disseminating critical water management information is an important one. The Commission supports the many outreach and education actions and recommendations identified in the Objectives and Resource Management Strategies, and a commitment to increased opportunities for public discourse, engagement and transparency for water projects, programs, decisions, and actions.

In addition to these overarching themes, the Commission would like to offer comments on several specific recommendations contained in the Resources Management Strategies. In many cases, these are topics which are directly related to the Commission's strategic plan as well as areas of interest to the Commission that have been highlighted during public meetings.

	Topic and Recommendation	Commission Comments	Link(s) to Strategic Plan	Section
1	Water Rights: The state should clarify policy and improve incentives, assurances, and water rights protections to allay fears over the loss of water rights resulting from improved water use efficiency.	The Commission agrees that it is important to recognize and work to protect existing water rights, including tribal water rights when considering new water management strategies.	Goal 3A	Chapter 2 (Agricultural Water Use Efficiency), Recommendation 1
2	Conservation Rate Structures: DWR and other agencies should evaluate the effectiveness of rate structures in conservation and assist utilities in developing sustainable conservation rate structures.	The Commission has been made aware of the challenges water agencies face when implementing conservation pricing, including a briefing on potential rate structure, Consumption-Based Fixed Revenue at its May 2013. Commission supports this recommendation to continue to evaluate effective approaches to promote conservation and rate structures.	Goal 3	Chapter 3 (Urban Water Use Efficiency), Recommendation 1
3	The Energy-Water Nexus: This section highlights the connection between urban water use, energy, and greenhouse gases.	The Commission supports additional work and research to promote energy savings through water conservation measures and to increase awareness of the water-energy nexus by the public and policymakers. This item, which has been discussed with the Commission in the context of the State Water Project energy use and production, as well as the October 2013 AB 32 update. Recognition of the Water - Energy Nexus is increasingly important as the state deals with the impacts of climate change. The Commission appreciates the good work of the Water Plan to highlight	Goal 3E	Chapter 3 (Urban Water), Box 3-13

		the need for action on this important issue.		
4	Quantification of Benefits: This section stresses the importance of quantifying the benefits of system reoperation strategies.	The Commission's document Description and Screening of Potential Tools and Methods to Quantify the Public Benefits of Water Storage Projects provides guidance on economic methods for quantifying the public benefits of System Reoperation Projects. The California Water Plan may wish to reference the document in this section.	Goal 3B	Chapter 7 (System Reoperation), Body, Pages 7-8 and 7-9
5	Water Transfers: The approval process of state and federal agencies for water transfers should be streamlined where approvals are required, while protecting water rights, the environment, and local economic interests.	At the Commission's joint meeting with the California Food and Agriculture Board in September 2013 and the November 2013 Commission meeting this issue has been discussed. The Commission will consider its role in assisting state, federal, and local agencies to manage water transfers while addressing economic, environmental, and third-party impacts.	Goal 3A	Chapter 8 (Water Transfers), Recommendation 3D
6	Bulletin 118: The Water Plan used the development of this Resource Management Strategy to fill the need for an updated Bulletin 118. Bulletin 118 has not been updated since 2003 due to funding constraints.	The Commission commends DWR on this collaborative approach to provide important data and information that will support sound groundwater management decisions, especially in light of funding constraints that have prevented DWR from updating Bulletin 118. Additionally, the Commission encourages DWR to ensure that data developed through this process is at a scale that will assist local water managers in making groundwater management decisions.	Goal 3C	Chapter 9 (Conjunctive Management), Body, Page 9-9
7	Bond Funding: Projects will request bond funding from	While discussions on a revised statewide water bond continue, the Commission is		Chapter 9 (Conjunctive Management),

	California Water Commission by 2016.	working with DWR on sound methodologies for quantifying public benefits of water storage projects, and strategies for effectively investing in the public benefits of water projects in California. However, the timeline for bond funding will only be finalized if or when the bond is passed.		Recommendation 10F
8	Surface Storage Investigations: CALFED signatories and stakeholders should continue to prioritize work efforts to complete the feasibility and environmental studies of the surface storage investigations.	The Commission has been briefed on DWR's Surface Storage investigations as part of its overall work on water storage projects and supports the ongoing development of work that will inform future decisions and funding for projects to address the state's water management needs.	Goal 3B	Chapter 13 (Surface Storage – CALFED), Recommendation 1
9	Drinking Water Standards and Costs: The cost of providing drinking water in compliance with all drinking water standards is steadily increasing due to increasing costs for energy and materials and increasing regulations requiring higher levels of treatment.	The Commission has identified this issue as one of great significance and importance. A greater understanding of the relationship between increasing treatment standards, costs for water management, and energy use is needed to fully understand the impacts of these changes on current and planned water management activities in communities throughout the state.	Goal 3E	Chapter 15 (Drinking Water), Body, Pages 15-8 and 15-9
10	Disadvantaged Communities and Environmental Justice: This Resource Management Strategy contains a basic description of Environmental Justice issues and activities.	The Commission recommends that, in addition to the information already provided in this chapter, that inclusion of a stronger statement about the importance of Environmental Justice and access to safe drinking water would be beneficial.		Chapter 15 (Drinking Water), Body, Page 15-16

11	Ecosystem Restoration: Multidisciplinary approaches to water, flood, and forest management should be promoted. Efforts should recognize the value of ecosystem services and meadow restoration.	The Commission has identified the issue of improved forest and meadow management activities as one which warrants further study and understanding for water supply and ecosystem benefits. Additionally, the Commission recognizes that ecosystem services are typically not valued in a traditional sense so considering how to best develop system of payments for ecosystem services may be an effective way to ensure they are appropriately valued in water management.	Goal 3B	Chapter 22 (Ecosystem Restoration), Recommendation 2 and Chapter 23 (Forest Management), Body, Pages 23-5 to 23-7
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Finally, the Commission would like to express its strong support for the Water Plan Update process. For more than 55 years, this document has served as a master plan for state water development to guide the activities of agencies in planning, construction, and operation of water management projects. Over the past decade, the Plan has broadened its scope to provide a comprehensive framework for a sustainable water management, including strategies to improve water supply reliability, to protect water quality, and to manage water in ways that more fully protect and restore the environment. The Plan's Resource Management Strategies, the Regional Reports, and the Reference and Technical Guides represent the most inclusive set of data and information available on California Water Management; its importance to the success and sustainability of our state's water future cannot be overestimated. The Commission is extremely concerned that the scope, quality, and quantity of work for the Water Plan not be compromised or limited due to funding reductions to the program. We strongly urge the Administration and the Legislature to provide the necessary financial resources to continue the excellent work of the Water Plan in future years.

On behalf of the California Water Commission, we thank you for the opportunity to provide these comments and look forward to working with you to address these compelling challenges.

Sincerely,



Joe Byrne
Chairman
California Water Commission

Mr. Paul Massera
December 2, 2013
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